C&W COMMUNICATIONS, INC. CERTIFICATION OF CPNI FILING (FEBRUARY 6, 2006) EB-06-36; EB-06-TC-060

I, Steve Gill, President of C&W Communications, Inc. ("C&W"), hereby certify that C&W has established operating procedures to ensure compliance with the rules set forth in 47 C.F.R. § 64.2009 concerning the protection of customer proprietary network information ("CPNI"). A copy of C&W's policy for ensuring compliance with the FCC's rules governing CPNI protection is attached to this Certification.

Steve Gill

Dated: February 6, 2006

C&W COMMUNICATIONS, INC. CUSTOMER PROPRIETARY NETWORK INFORMATION COMPLIANCE POLICY

C&W Communications, Inc. ("C&W") has adopted the following procedures to ensure compliance with the FCC's rules concerning use of customer proprietary network information ("CPNI"), which are set forth in 47 C.F.R. § 64.2009:

- 1. It is the corporate policy of C&W not to furnish any CPNI, including a customer's voice mail password, to any party who requests such information without first verifying that the requesting party is the customer or obtaining the customer's written consent.
- 2. If the requesting party purports to be the customer whose account is the subject of the request, the C&W representative handling the request shall verify the name, social security number, date of birth, driver's license number, state of license, and account password (if applicable) of the requesting party to confirm that the requesting party is the customer to whose account the request relates.
- 3. C&W shall not provide any third party with access to any customer's account information unless the customer has furnished AWC with a signed, written consent that identifies the customer's name, address, date of birth, social security number, driver's license number, state of license, and account password (if applicable); provided, however, that a signed, written consent shall not be required in the event that a third party requests a customer's CPNI pursuant to a lawfully issued search warrant or subpoena.
- 4. Customer bills shall only be mailed to the name and address identified on a customer's account, and no copies of any customer bill shall be mailed to any third party without the customer's signed, written consent, which consent shall conform with the requirements set forth in paragraph 3 above.
- 5. All C&W personnel shall receive training on authorized and unauthorized use of CPNI, and C&W shall maintain written confirmation that all personnel have received such training and understand the requirements imposed by 47 C.F.R. § 64.2009. C&W shall have in place a disciplinary policy for all personnel relating to unauthorized use of CPNI.
- 6. It is the corporate policy of C&W not to engage in any sales or marketing campaign that would involve the use of its customers' CPNI. If C&W decides to engage in such activities in the future, the company shall abide by all the requirements imposed by 47 C.F.R. § 64.2009.